

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

KYKO GLOBAL, INC., a Canadian corporation, KYKO GLOBAL GmbH, a Bahamian corporation, PRITHVI SOLUTIONS, INC., a Delaware Corporation

Plaintiffs,

v.

PRITHVI INFORMATION SOLUTIONS, LTD, an Indian corporation, VALUE TEAM CORPORATION, a British Virgin Islands corporation, SSG CAPITAL PARTNERS I, L.P., a Cayman Islands Limited Partnership, SSG CAPITAL MANAGEMENT (HONG KONG) LIMITED, a private Hong Kong company, MADHAVI VUPPALAPATI, an individual, ANANDHAN JAYARAMAN, an Individual, SHYAM MAHESHWARI, an individual, IRA SYAVITRI NOOR A/K/A IRA NOOR VOURLOUMIS, an individual, DINESH GOEL, an individual, WONG CHING HIM a/k/a Edwin Wong, an individual, ANDREAS VOURLOUMIS, an individual, PRITHVI ASIA SOLUTIONS LIMITED, a Hong Kong company

Defendants.

Case No. 2:18-cv-1290-WSS

NOTICE OF SUBMISSION OF PLAINTIFFS' PROPOSED PROTECTIVE ORDER

NOW COME Plaintiffs Kyko Global, Inc., Kyko Global GmbH, and Prithvi Solutions Inc. (collectively "Plaintiffs"):

The Defendants proposed entry of the version of a protective order found in the Court's local patent rules, LPR Appx. 2.2 with no modification. Plaintiffs proposed several modifications to the standard form which Defendants have rejected.

Pursuant to the Court's Case Management Order (ECF No. 174), Plaintiffs attach hereto

as **Exhibit A**, a red-line of the form protective order reflecting Plaintiff's proposed modifications to terms and conditions and to Appendix A and B forms related to experts and vendors. A clean copy reflecting Plaintiffs' proposed modifications is attached as **Exhibit B**.

Respectfully submitted,

/s/ Joseph F. Rodkey, Jr.
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served via the Court's CM/ECF Notification System on this 25th day of August, 2020 upon the following:

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The undersigned certifies that a true and correct copy of the foregoing document was served via U.S. Mail for posting on this 25th day of August, 2020 upon the following:

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The undersigned certifies that a true and correct copy of the foregoing document was served via Email on this 25th day of August, 2020 upon Madhavi Vuppalapati by sending an email to:

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/s/ Joseph F. Rodkey, Jr.